Minnesota Buffalo Association promotes, markets & represents the American Buffalo (Bison) & its industry while encouraging fellowship among bison enthusiasts

## MINNESOTA BUFFALO ASSOCIATION

CREATING A PROGRESSIVE Tumble IN THE BISON INDUSTRY

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Ron Sherd 23103 465TH ST Marepp + Mw 55956-7511 Conservation Operations Division Natural Resources Conservation Service ATTN: Conservation Security Program P.O. Box 2890 Washington, DC 20013-2890

## To Whom it May Concern:

Thank you for providing public comment on the USDA's proposed rules for the Conservation Security Program. However, the proposed rules for the CSP needs to eliminate the restrictions on participation in the CSP to a few "selected watersheds" and undefined "categories."

As a certified organic farmer, it is my view that the CSP should be a nationwide, accessible program, open to ALL farmers! CSP should allow farmers with USDA-approved organic certification plans under the National Organic Program to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both.

Also, the USDA's proposed rules fail to made adequate payments to farmers currrently participating in effective conservation practices. It is my opinion that enhanced payments and NOT cost-share payments, should reward those farmers who participate in environmentally-beneficial systems. CSP payments should be set at the local rental rates based on land capability without the 90 % reduction proposed by the USDA!

Finally, your proposed rules should address managed rotational grazing and resource conserving crop rotations. Please be reminded that managed rotational grazing is recognized by scientists and farmers as an excellent way to protect our soil and water. Also, it has been scientifically proven that diversified crop rotations effectively build and improve soil while managing pests and reducing erosion.

Again, thank you for allowing public comment on the proposed rules. With genuine concern, I ask that the CSP be offered to ALL of America's farmers, especially certified organic farmers, to preserve our nation's natural resources for future generations.

Sincerely,

Mike Stephani 1798 Grant Street

De Pere, WI 54115

February 25, 2004

Conservation Operations Division
Natural Resources Conservation Service
ATTN: Conservation Security Program
P.O. Box 2890
Washington, DC 20013-2890

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Sincerely,

Lee Fremi

E2395 County Road A Luxemburg, WI 54217

P. O. Box 98 Centerville, SD 57014 February 24, 2004

Conservation Security Program Comments ATTN: David McKay NRCS Conservation Operations Division P. O. Box 2890 Washington, DC 20013

Dear Mr. McKay:

I am writing to suggest important changes to the USDA's proposed rules for the operation of the Conservation Security Program (CSP). I support the CSP as a nationwide conservation program that will reward the best working farmlands and motivate the rest. As intended by Congress, the CSP should be open to all farmers in the US practicing effective conservation.

Most importantly, USDA should issue a supplement to the rule. This should be done immediately to fix major problems with the proposed rules issued on January 2. These are not consistent with the law authorizing the CSP. The main changes to make are as follows:

--Restore Green Payments -- The proposed rule calls for pennies per acre for base payments. 5% cost-share payments for practices, and enhanced payments that only cover the farmer's costs. Restore meaningful incentive payments so that farmers are adequately rewarded for outstanding environmental performance.

-- Make All Farms Eligible - Restore eligibility for all by eliminating the selection of "priority watersheds" and the undefined "categories" for enrollment.

-- Motivate Farmers -- Allow farmers to achieve high conservation standards while in the program, not as a precondition for applying. The proposed rules set the bar too high for entry into CSP.

-- Restore Comprehensive Conservation Approach -- Allow farmers to address significant natural resource concerns on their farm. Allow use of all effective conservation practices, instead of severely restricting what may be done.

-- Reward High Performance - Add significant enhanced payments for resource-conserving crop rotations and managed rotational grazing, as provided in the law.

Thank you for your consideration of these suggestions; I believe they would help this innovative conservation program deliver much needed dollars to family farms for environmental stewardship.

S. Penny Gingliam